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January 12, 2023

**Via ECF**

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Rodriguez v. Edison Restaurant. et al.***  
**Civil Action No. 22-cv-01909-VSB**

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J. 01/17/2023**

If Plaintiff fails to file for default judgment by February 17, 2023, I may dismiss this case for failure to prosecute pursuant to Federal Rule of Civil Procedure 41(b).

Dear Judge Broderick:

We represent the plaintiff, Leocadia Rodriguez, in the above-captioned matter, and write to request an extension of the deadline to file a motion for default judgment, currently set for January 18, 2023. This is the first such request.

On January 11, 2023 the Court ordered Plaintiff to submit her motion for default judgment by January 18, 2023. Due to the need to first obtain certificates of default; the need to obtain an affidavit from Plaintiff, which affidavit will need to be professionally translated; and the federal holiday on January 16, 2023, we do not believe that we will be able to meet the one-week deadline.

Accordingly, we respectfully request an extension to February 17, 2022, in order to adequately prepare and file the motion for default.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eliseo Cabrera  
Eliseo Cabrera